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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

U.S. DISTRICT COURT
MID. DIST. TENN.

ANTOINE SMITH Name)
Prison Id. No. 379974)
____ Name)
Prison Id. No. _____)
Plaintiff(s))
____)
v.)
____)

(List the names of all the plaintiffs
filing this lawsuit. Do not use "et
al." Attach additional sheets if
necessary.)

Civil Action No. _____
(To be assigned by the Clerk's
office. Do not write in this space.)

Jury Trial Yes No

BRUCE Woods, et al Name)
CCA CORPORATION Name)
Defendant(s))

(List the names of all defendants
against whom you are filing this
lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
FILED PURSUANT TO 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

Yes No

- B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs ANTOINE SMITH

Defendants Douglas Tackett, Cal Morey

2. In what court did you file the previous lawsuit? UNITED STATES DISTRICT COURT FOR MIDDLE DISTRICT OF TENNESSEE
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)
3. What was the case number of the previous lawsuit? 3:12-cv-00812
4. What was the Judge's name to whom the case was assigned? TODD J. CAMPBELL
-
5. When did you file the previous lawsuit? 2012 (Provide the year, if you do not know the exact date.)
6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? DISMISSED
-
7. When was the previous lawsuit decided by the court? 2013 (Provide the year, if you do not know the exact date.)
8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit?

Yes No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

- A. What is the name and address of the prison or jail in which you are currently incarcerated? SOUTH CENTRAL CORRECTIONAL FACILITY, P.O. Box 279, CLIFTON, TN 38425
- B. Are the facts of your lawsuit related to your present confinement?
- Yes No
- C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.
-
- D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?
- Yes No

If you checked the box marked "No," proceed to question II.H.

- E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

Yes No

- F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? DIRECTLY TOLD PRISON AUTHORITIES AND WENT THRU PROPER GRIEVANCE PROCEDURE.
2. What was the response of prison authorities? I WAS QUESTIONED AND RECEIVED A PHYSICAL EVALUATION BUT ASK FOR A MENTAL EVALUATION

- G. If you checked the box marked "No" in question II.E above, explain why not. _____

- H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

Yes No

- I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

Yes No

- J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? _____

2. What was the response of the authorities who run the detention facility? _____

- L. If you checked the box marked "No" in question II.I above, explain why not. _____

PRIVATLY OWN FACILITY, LCA IN AUTHORITY BY STATE WITH

Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.

III. PARTIES TO THIS LAWSUIT

- A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: ANTONIE SMITH

Prison Id. No. of the first plaintiff: # 379974

Address of the first plaintiff: SOUTH CENTRAL CORRECTIONAL CENTER
P.O. Box 279, 555 FOREST AVENUE, CLIFTON TN 38425
(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: _____

Prison Id. No. of the second plaintiff: SOUTH CENTRAL CORRECTIONAL CENTER

Address of the second plaintiff: CLIFTON, TN 38425

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: BRUCE WOODS OFFICIAL/INDIVIDUAL

Place of employment of the first defendant: SOUTH CENTRAL CORRECTIONAL CENTER, P.O. Box 279, CLIFTON, TN 38425

The first defendant's address: _____

Named in official capacity? Yes No

Named in individual capacity" Yes No

2. Name of the second defendant: CORRECTIONS CORPORATION OF AMERICA

Place of employment of the second defendant: SOUTH CENTRAL CORRECTIONAL CENTER

The second defendant's address: P.O. Box 279, CLIFTON, TN 38425

Named in official capacity? Yes No

Named in individual capacity" Yes No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four sides.

ON THE DAY 28TH OF FEB, 2014. AFTER ENTERING THE OFFICE OF PRINCIPAL BRUCE Woods AT SCCF IN CLIFTON, TENN. I, MR. ANTOINE SMITH WAS SEXUALLY PROPOSITION AND MR. Antoine SMITH'S TESTICALS WAS GRABBED AND SQUEEZED BY PRINCIPAL BRUCE Woods AT SOUTH CENTRAL CORRECTIONAL FACILITY IN CLIFTON, TN. MR. A. SMITH PUSHED MR. Woods HANDS OFF OF MR. A. SMITH. MR BRUCE Woods THEN CALLED A SECURITY CODE ON MR A. SMITH ONLY MR. BRUCE Woods AND MR. Antoine SMITH WERE PRESENT INSIDE OF HIS OFFICE HOWEVER TWO INMATE FROM MR. BRUCE Woods OFFICE OBSERVED THIS INCIDENT, HE GRABBED REALLY HARD. SMITH, ANTOINE TOLD THE SECURITY TEAM WHAT HAD HAPPENED AND THEY TRANSFERRED ME TO MED. ANTOINE SMITH ANSWERED SOME QUESTIONS AT THAT TIME AND WAS SENT BACK TO SMITH POD GEMINI A RM 234. A. SMITH WROTE A GRIEVANCE AND PROVIDED EYE WITNESS ACCOUNT AS TO WHAT THESE TWO INMATE SAW. MR ANTOINE SMITH WAS TOLD THAT AN INVESTIGATION WOULD BE DONE ON THIS MATTER AND THAT WAS LAST THING HEARD ON THIS MATTER.

MR. BRUCE Woods RETALIATED BY A SERIES OF WRITE-UPS IN WHICH AFTER TEN WRITE-UPS NONE WAS PROMOTED ALL WAS DISMISSED. MR. BRUCE Woods CONTINUE TO HARRASS ME MR. A. SMITH. MR. ANTOINE FOLLOWED ALL PROPER CHANNEL JUST TO BE IGNORED TOTALLY ABOUT HIS COMPLAINT.

LATER MR ANTOINE SMITH FOUND INFORMATION SHOWING THAT SOUTH CENTRAL CORRECTIONAL FACILITY KNEW ABOUT PREVIOUS SEXUAL MISCONDUCT CONCERNING MR. BRUCE Woods BUT STILL KNOWINGLY PLACED INMATES IN DANGER AND POTENTIAL DANGER.

V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant.

- A. THAT ALL DEFENDANTS BE REMOVED FROM THEIR POSITION.
- B. A FORMAL APOLOGY BE GIVEN TO MR ANTOINE SMITH BY CCA.
- C. COMPENSATORY DAMAGES FOR EMOTIONAL AND PHYSICAL INJURY, AS SEEN FIT BY JURY.
- D. FOR MR. ANTOINE SMITH TO BE MOVED TO ~~THE~~ CLOSER "STATE" PENITENTIARY.
- E. THAT A CCA POSITION BE FILLED BY A QUALIFIED PERSON OF MR ANTOINE CHOICE.
- F. I request a jury trial. Yes No

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Antoine C Smith Date: 2/5/15
Prison Id. No. 379974

Address: SOUTH CENTRAL CORRECTIONAL FACILITY, P.O. Box 279 CLIFTON, TN
38425

(Include the city, state and zip code.)

Signature: _____ Date: _____

Prison Id. No. _____

Address: _____

(Include the city, state and zip code.)

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS, TOGETHER. Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.

ADDITION TO PAGE 4 OF PLAINTIFF'S COMPLAINT

NAME OF DEFENDANT: ARVIL CHAPMAN

EMPLOYMENT ADDRESS: SOUTH ~~E~~ CENTRAL CORRECTIONAL FACILITY
P.O. BOX 279

CAPACITY: OFFICIAL CLIFTON, TN 38425

* DEFENDANT: DANIEL PRITCHARD

SOUTH CENTRAL CORRECTIONAL FACILITY
P.O. BOX 279
CLIFTON, TN 38425

CAPACITY: OFFICIAL

* DEFENDANT: DANIEL SULLIVAN

SOUTH CENTRAL CORRECTIONAL FACILITY
P.O. BOX 279
CLIFTON, TN 38425

CAPACITY: OFFICIAL

* DEFENDANT: PERSON THAT WAS IN CHARGE OF INTERNAL AFFAIRS "PONDS"
DURING WINTER OF 2014 ("WILL BE PROVIDED")

SOUTH CENTRAL CORRECTIONAL FACILITY
P.O. BOX 279

CAPACITY: CLIFTON, TN 38425

OFFICIAL

ADDITION TO PAGE 5 STATEMENT OF FACTS
AND RELIEF REQUESTED.

I INMATE ANTOINE SMITH IS IMPOSING THIS COMPLAINT/PETITION TO THE UNITED STATES DISTRICT COURT ON THE GROUNDS OF SEXUAL ASSAULT AND SEXUAL HARASSMENT AGAINST MR. BRUCE WOODS PRINCIPAL AT SOUTH CENTRAL CORRECTIONAL FACILITY, CCA CLIFTON TN. A ACTION THAT HAS CONSTITUTED A VIOLATION OF THE EIGHTH AMENDMENT, 42 U.S.C. § 15601(13).

PRISON RAPE ELIMINATION ACT (PREA) REQUIRES THAT FACILITIES ADOPT A ZERO TOLERANCE APPROACH TO THIS FORM OF ABUSE. 42 U.S.C. § 15602 (1).

SEXUAL ASSAULT OF PRISONERS BY CORRECTIONAL OFFICERS OR PRISON STAFF VIOLATES THE EIGHT AMENDMENT. FARMER V. BRENNAN, 511 U.S. 825 (1994); SCHWEIK V. HARTFORD, 204 F.3d 1187 (9TH CIR. 2000).

I INMATE ANTOINE SMITH IMPOSING THIS CIVIL COMPLAINT/PETITION TO THE UNITED STATES DISTRICT COURT OF MIDDLE TENNESSEE ON THE GROUNDS OF INMATE ANTOINE SMITH'S RIGHT TO DECENT PRISON CONDITIONS. ANTOINE SMITH MAKE THE CLAIM THAT, WARDEN, ARVIL CHAPMAN, DANIEL PRITCHARD, DANIEL SULLIVAN, (PONDS, INTERNAL AFFAIRS), VIOLATE(S) ANTOINE SMITH'S RIGHT TO DECENT CONDITIONS IN PRISON BY KNOWINGLY AND DELIBERATELY PLACE ME ANTOINE SMITH IN AND AROUND A KNOWN SEXUAL PREDATOR "BRUCE Woods" KNOWINGLY THAT THE LIKELIHOOD OF AN SEXUAL ATTACK BY MR BRUCE Woods WAS Highly PROVOCATIVE. AND DELIBERATELY DISREGARDING CLEAR EYE WITNESSES ACCOUNT OF MR BRUCE Wood UNPROFESSIONAL SEXUAL MISCONDUCT. CLEARLY VIOLATING ANTOINE SMITH'S EIGHTH AMENDMENT RIGHT WHEN THEY ACTED WITH DELIBERATE INDIFFERENCE TO A PRISON CONDITION THAT EXPOSES A PRISONER TO AN UNREASONABLE RISK OF SERIOUS HARM OR DEPRIVES A PRISONER OF A BASIC HUMAN NEED FARMER V. BRENNAN, 511 U.S. 825 (1994); WILSON V. SEITER, 501 U.S. 294 (1991).

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